IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MAXINE SNYDMAN, :

Case No.: 2:10-cv-1344 (MMB)

Plaintiff,

Civil Action

v.

: DECLARATION OF MARK A.

AMPER, POLITZINER & MATTIA, LLP,

: SALOMAN, ESQ., IN SUPPORT

: OF DEFENDANT'S MOTION TO

Defendant. : <u>COMPEL DISCOVERY</u>

I, MARK A. SALOMAN, ESQ., hereby certify as follows:

1. I am an attorney-at-law admitted *pro hac vice* and Special Employment Litigation Counsel at the law firm of Proskauer Rose LLP, and in such capacity am fully familiar with the facts of this matter. I am authorized to submit this Declaration in support of the motion of defendant Amper, Politziner & Mattia, LLP ("Amper") to compel discovery from plaintiff Maxine Snydman ("Plaintiff").

2. The parties, after reasonable effort, are unable to resolve the dispute that is the subject of the pending motion to compel discovery.

I hereby declare under penalty of perjury that the foregoing statements made by me are true and correct.

Dated: February 24, 2011 Newark, New Jersey /s/Mark A. Saloman MARK A. SALOMAN